1 The Honorable Michelle L. Peterson 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 9 10 DAMAN LEE MICHAEL WANDKE, Case No. 2:22-cv-00396-MLP 11 Plaintiff, STIPULATED MOTION TO EXTEND 12 PRETRIAL DEADLINES 13 NATIONAL RAILROAD PASSENGER 14 CORPORATION, 15 Defendant. 16 Plaintiff Daman Wandke, by and through his respective undersigned attorneys, and 17 Defendant National Railroad Passenger Corporation, by and through its respective undersigned 18 attorneys, (collectively "the Parties") hereby move to extend upcoming Pretrial case schedule 19 deadlines according to the schedule proposed below. 20 The Parties have conferred and agreed that the proposed schedule is in the best interests 21 22 of both parties, and the Parties respectfully request that this Court modify the pending pretrial 23 deadlines in this case as follows: 24 25 26 WASHINGTON CIVIL & DISABILITY ADVOCATE Stipulated Motion to Extend Pretrial Deadlines - 1 4115 Roosevelt Way NE, Suite B No. 2:22-cv-00396-MLP Seattle, WA 98105

(206) 428-3172

1	Event	Date Set	I
2	All motions in limine must be filed by this date and noted on the	1/23/2023	1
3	motion calendar no earlier than the third Friday after filing but no later than the Friday before the pretrial conference (see LCR		
4	7(d)(4))	2/2/2022	<u> </u>
5	Agreed LCR 16.1 Pretrial Order due	2/3/2023	_
6	Trial briefs proposed voir dire and jury instructions, and trial exhibits due.	2/10/2023	2
7	Final Pretrial conference is scheduled at 1:30 p.m. in Courtroom	2/15/2023	2
8	12A on:		<u></u>
9	Dated this 20th day of January 2023		
10	By:		
11	WASHINGTON CIVIL & DISABILITY ADVOCATE		
12	WASHINGTON CIVIL & DISABILITY ADVOCATE		
13		/s/ Marielle Maxwell Marielle Maxwell, WSBA #54957 4115 Roosevelt Way NE, Suite B Seattle, WA 98105	
14	4115 Roosevelt Way NE, Suite B 4115 Roosevelt Way		
15	(206) 876-8515 (206) 455-6430		
16	conrad@wacda.com marielle@wacda.co	om	
17	PRUETT WALTERS LARSON PPLC		
18	/s/ Daniel J. Gunter Mark D. Walters, WSBA No. 25537		
19 20	Daniel J. Gunter, WSBA No. 27491 11120 NE 2d Street, Suite 100 Bellevue, WA 98004		
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Mark D. Walters: (206) 669-6986 mwalters@rpwlawfirm.com Daniel J. Gunter: (651) 529-0163 dgunter@rpwlawfirm.com

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Attorneys for Plaintiff

Stipulated Motion to Extend Pretrial Deadlines - 2 No. 2:22-cv-00396-MLP

WASHINGTON CIVIL & DISABILITY ADVOCATE 4115 Roosevelt Way NE, Suite B Seattle, WA 98105 (206) 428-3172

Proposed Date

1/26/2023

2/3/2023

2/10/2023

2/15/2023

1 LITTLER MENDELSON P.C. 2 s/ Derek Bishop s/ Mathias Deeg 3 Derek Bishop, WSBA #39363 Mathias Deeg, WSBA #52864 One Union Square One Union Square 4 600 University Street, Suite 3200 600 University Street, Suite 3200 5 Seattle, WA 98101-3122 Seattle, WA 98101-3122 206.381.4928 206.381.4942 6 mdeeg@littler.com debishop@littler.com 7 s/Daniel L. Thieme Daniel L. Thieme, WSBA #12855 8 One Union Square 9 600 University Street, Suite 3200 Seattle, WA 98101-3122 10 206.623.3300 dthieme@littler.com 11 Attorneys for Defendant 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26

Stipulated Motion to Extend Pretrial Deadlines - 3 No. 2:22-cv-00396-MLP WASHINGTON CIVIL & DISABILITY ADVOCATE 4115 Roosevelt Way NE, Suite B Seattle, WA 98105 (206) 428-3172

1 **CERTIFICATE OF SERVICE** 2 I hereby certify under penalty of perjury under the laws of the State of Washington that 3 on the date below, I Filed with the court's ECF system which sent notice of the electronic filing 4 5 of the proceeding document to all following attorneys of record in this proceeding: 6 7 Derek Bishop, WSBA No. 39363 Mathias Deeg, WSBA No. 52864 LITTLER MENDELSON, P.C. LITTLER MENDELSON, P.C. 8 One Union Square One Union Square 9 600 University Street Suite 3200 600 University Street Suite 3200 Seattle, WA 98101 Seattle, WA 98101 10 Telephone: 206-381-4942 Telephone: 206-381-4928 Facsimile: 206-447-6965 Facsimile: 206-447-6965 11 Email: debishop@littler.com Email: mdeeg@littler.com 12 13 Daniel Thieme, WSBA No. 12855 LITTLER MENDELSON, P.C. 14 One Union Square 600 University Street Suite 3200 15 Seattle, WA 98101 16 Telephone: 206-623-3300 Facsimile: 206-447-6965 17 Email: dthieme@littler.com 18 Attorneys for Defendant 19 20 DATED this 20th day of January 2023 21 /s/Marielle Maxwell 22 Marielle Maxwell 4115 Roosevelt Way NE, Suite B 23 Seattle, WA 98105 24 206-428-3172 25 26 WASHINGTON CIVIL & DISABILITY ADVOCATE Stipulated Motion to Extend Pretrial Deadlines - 4 4115 Roosevelt Way NE, Suite B No. 2:22-cv-00396-MLP

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